REMARKS

Claims 1-7 are currently pending in the application. The Specification has been amended in response to the Examiner's objections as follows: change the reference number 60 to 50 at page 10, line 25; change the reference number 61 to 51 at page 10, line 27; change the reference number 62 to 52 at page 10, line 29; change the reference number 63 to 53 at page 11, line 2; and change the reference number 64 to 54 at page 11, line 3. No new matter has been added.

The Claimed Invention

The claimed invention involves a system and a process for managing business, technical and operational data that uses a single interface in a shared space environment over the Internet, including a common authentication and environment. A supplier portal creates a central repository for the registration process, information, company information, and user information, making this information available to all applications that open into the supplier portal. In response to a request received from a supplier (guest) coordinator 101, a userid/password 102 is obtained, which is then supplied to the business representative 103. An application coordinator requests to create company and provide information to the portal administrator at 104. This information includes the company name, application, and supplier coordinator name, userID, e-mail, etc. A determination is made in decision block 105 as to whether the supplier is registered. If the supplier is not registered, then a company profile is created in function block 106. If the supplier is registered, than a further determination is made in decision block 107 as to whether the application is registered. If the application is not registered, then a company and its mapping is created in function block 108 and, in function block 109, the supplier coordinator is registered and authorized to use the application. If the application is registered as determined in decision block 107, then a further determination is made in decision block 110 as to whether the application is mapped to the supplier and supplier coordinator. If the application is not mapped to the supplier and supplier coordinator, the

supplier coordinator mapping to the application is crated in function block 111. Finally, an e-mail not is sent to the supplier coordinator application administrator in function block 112.

Claims 1-7 have been rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 6,606,606 to Starr. Applicants traverse on the basis that the rejection is ultimately based on the unsupported finding that an integrated financial transaction method, as in Starr, is equivalent to a process, or a data processing method, for managing business, technical and operational data as claimed by Claims 1-7. Applicants respectfully traverse on the basis that the Examiner's implicit findings in this regard constitute impermissible hindsight as well as an improper assertion of technical fact in an area of esoteric technology without support by citation of any reference work. *See* M.P.E.P. § 2144.03, citing *In re Ahlert*, 424 F.2d 1088, 1091, 165 USPQ 418, 422-21 (CCPA 1970).

In addition, an integrated financial transaction method, as disclosed and claimed by Starr, cannot be employed without significant alteration as a process, or a data processing method, for managing business, technical and operational data, as claimed by the claimed invention. Even if it were hypothetically possible to convert an integrated financial transaction method for managing business, technical and operational data, such hypothetical conversion would make the method unsuitable for financial transactions according to the method disclosed and taught by Starr. Accordingly, Applicants respectfully traverse on the basis that any hypothetical conversion of the method of Starr to for managing business, technical and operational data would make the method disclosed and taught by Starr "inoperable for its intended purpose." *In re Gordon*, 221 U.S.P.Q. 1125, 1127 (Fed. Cir.1984).

Applicants further traverse the Examiner's rejection of Claims 1-7 for the reasons discussed below.

Claims 1 and 7

Independent Claims 1 and 7, which have been rejected as anticipated by Starr, claim a supplier portal which, among other things, handles account setup in a manner patentably distinct from what is disclosed and taught by Starr. For example, where the supplier portal of Claims 1 and 7 deals with registration at the user level (Claim 1, lines 4-6; *see also* Claim 7, lines 4-5), the invention disclosed of Starr does registration at a subscriber level. (Starr, column 10, lines 13-21, cited in the Office Action at 3) In addition, the invention disclosed by Starr deals solely with financial transactions operations such as bill payment, payroll services, bank account management, among others. (Starr, column 10, line 47 – column 11, line 11, cited in the Office Action at 3) The claimed supplier portal, by contrast, allows generic registration and entitlement functions for any industry. (Claim 1, lines 17-19; *see also* Claim 7, lines 17-19) Furthermore, the claimed supplier portal provides approval notifications by actual e-mails sent to prospective approvers. Each such notification e-mail contains a link to the pending request to enable an approver to review the request in detail. (Claim 1, lines 20-22; *see also* Claim 7, lines 20-22) Starr does not have any concept of an approval process beyond actions taken on the server itself. And hence, no concepts of e-mails relating to an approval process either. (Starr, column 11, lines 12-35, cited in the Office Action at 3)

Claims 1 and 7 have been rejected on the basis that the Examiner incorrectly found the limitation have been rejected on the basis *inter alia* that the Examiner incorrectly found the limitation "providing a supplier portal from which new guests indicate, using a Graphical User Interface (GUI) of the supplier portal Web page, whether they are a registered user or not" (Claim 1, lines 4-6; *see also* Claim 7, lines 4-5) to be anticipated by the following passage from the disclosure of Starr:

> FIG. 5 shows in more detail the types of operations that a subscriber 12 would employ for initiating an account with the server 14 and for accessing and operating the application platform provided by server 14. Specifically FIG. 5

> illustrates that a session between the subscriber 12 and the server 14 begins with a log on wherein the system determines whether or not the subscriber 12 logging on to the system is a new user, or a user that has already registered and therefor has an account.

(Starr, column 10, lines 13-21, cited in the Office Action at 3) Conspicuously, the cited portion of Starr does not teach "providing a supplier portal from which new guests indicate, using a Graphical User Interface (GUI) of the supplier portal Web page, whether they are a registered user or not" as in Claim 1 as well as Claim 7. Equally conspicuously, Claims 1 and 7 do not claim a "subscriber," a "server," an "application platform," an "account," "initiating an account with the server 14," "accessing and operating the application platform provided by server 14," or "a session between the subscriber 12 and the server 14 begins with a log on wherein the system determines whether or not the subscriber 12 logging on to the system is a new user, or a user that has already registered and therefor has an account" as taught by the cited portion of the disclosure of Starr.

Claims 1 and 7 have also been rejected on the basis that the Examiner incorrectly found the limitation "determining whether a guest is a registered user from input by the guest, and if not a registered user, prompting the guest to select 'Register' to link to guest registration (GR) where they can obtain a Web userid/password that enables them to register for any of global procurement applications available under the supplier portal" (Claim 1, lines 7-10; *see also* Claim 7, lines 6-9) to be anticipated by the following passage from the disclosure of Starr:

> If the server 14 determines that a user is a new user, the web server 40 generates a HTML page that directs the subscriber 12 to enter information about the subscriber 12 for enrolling the subscriber into the system. For example, the web server 40 can generate an HTML page that asks for a user name, credit card number, identification of the type of small business being operated by the

> subscriber 12, such as a corporate business partnership, sole proprietorship, or trust.

(Starr, column 10, lines 21-28, cited in the Office Action at 3) The cited portion of the disclosure of Starr does not teach "guest," "registered user," "prompting the guest to select 'Register,'" "guest registration (GR)," "Web userid/password," "global procurement applications," or "supplier portal" as in Claim 1 as well as Claim 7. In addition, Claims 1 and 7 do not claim a "server," a "user," a "new user," a "web server," an "HTML page that asks for user name, credit card number, identification of the type of small business being operated," "subscriber," or "corporate business partnership, sole proprietorship, or trust" as in the cited portion of the disclosure of Starr.

Claims 1 and 7 have further been rejected on the basis that the Examiner incorrectly found the limitation "when a guest obtains a Web userID/password in GR, storing guest information in a GR data store" (Claim 1, lines 11-12; *see also* Claim 7, lines 10-11) to be anticipated by the following passage from the disclosure of Starr:

> Once the server 14 has received the completed form from the subscriber 12, the server 14 can open an account for the subscriber.

(Starr, column 10, lines 28-30) The cited portion of the disclosure of Starr does not teach "guest," "Web userid/password in GR," or "storing guest information in a GR store" as in Claim 1 as well as Claim 7. In addition, Claims 1 and 7 do not claim a "server," "receive the completed form from the subscriber," or "can open an account for the subscriber" as in the cited portion of the disclosure of Starr.

Claims 1 and 7 have been rejected on the basis that the Examiner incorrectly found the limitation "determining whether any applications have been authorized for a registered guest and, if not, prompting the guest to register for restricted applications in a portal common registration (PCR) where information is stored in a PCR data store throughout an application's approval cycle" (Claim 1, lines 13-16; *see also* Claim 7, lines 14-16) to be anticipated by the following passage from the disclosure of Starr:

> Once the account is open, the web server 40 may present to the subscriber 12 an HTML page that provides the subscriber 12 with a series of optional financial transactions that the subscriber 12 can activate and direct the server 14 to perform. For example, as shown by FIG. 5 the server 14 can present to the subscriber 12 an HTML page that includes graphical control elements which allow the subscriber 12 to instruct the application server to implement functions related to the subscriber's core account, a bill paying operation, access controls, download functions, or flash reports. For example, the subscriber 12 may select to view and perform transactions in the core account. The core account is or can be a cash management account which combines check writing and debit card services while providing true money market rates of return on all balances. Cash for all business needs such as paying checks or submitting the payrolls can be electronically debited from the core account.

(Starr, column 10, lines 30-47, cited in the Office Action at 3) The cited portion of Starr does not teach "determining whether any applications have been authorized for a registered guest," "if not, prompting the guest to register for restricted applications," "a portal common registration (PCR) where information is stored in a PCR data store," or an "application's approval cycle" as in Claim 1 as well as Claim 7. In addition, Claims 1 and 7 do not claim "[O]nce the account is open, the web server 40 may present to the subscriber 12 an HTML page," "provides the subscriber 12 with a series of optional financial transactions that the subscriber 12 can activate and direct the server 14 to perform," "server 14 can present to the subscriber 12 an HTML page," "graphical control elements which allow the subscriber 12 to instruct the application server to implement functions related to the subscriber's core account, a bill paying operation, access controls, download functions, or flash reports," "subscriber 12 may select to view and perform transactions in the core account," "core account is or can be a cash management account which combines check writing and debit card services while providing true money market rates of return on all balances," or "cash for all business needs such as paying checks or

submitting the payrolls can be electronically debited from the core account" as taught in the cited portion of the disclosure of Starr.

Claims 1 and 7 have been rejected on the basis that the Examiner incorrectly found the limitation "accessing information from the GR data store to automatically build a customized home page for the guest, this home page being modified and updated as the guest's requests for access to applications get approved" (Claim 1, lines 17-19; *see also* Claim 7, lines 17-19) to be anticipated by the following passage from the disclosure of Starr:

> The set up, execution, and ongoing management of all financial transactions can be maintained under the control of the subscriber 12 through accessing and controlling the core account through the server 14.
>
> The bill paying operation can be a bill paying procedure implemented by the server 14 that lets the subscriber 12 pay vendors electronically. The system provides ease of use and can track and consolidate the information regarding bill paying right into an account statement. Payments can include remittance information to enable proper crediting of the subscriber 12's accounts with vendors. Additionally, the server 14 can provide an account payroll function. The account payroll service will enable the subscriber 12 to set up and submit payroll information electronically. The subscriber 12 can then perform all standard payroll functions electronically from wherever the subscriber 12 chooses to log in, and at any time the subscriber 12 chooses to log in to the application server.
>
> Additionally, the server 14 allows the subscriber 12 to download information. Specifically, the server 14 allows the subscriber 12 to link the account with an accounting software package maintained by the subscriber 12, for example, at the PC workstation that the subscriber 12 is employing for accessing the server 14. The data can be downloaded to a file on a PC which can then be imported to an accounting package, such as Quicken, or any small business accounting package. Optionally, the server 14 may provide other financial

transaction controls such as controls for implementing retirement plans, small business lending, business credit card management, prepaid telephone services, or any other suitable financial transactions.

(Starr, column 10, line 47 – column 11, line 11, cited in the Office Action at 3) The cited portion of Starr does not teach "accessing information from the GR data store," "automatically build a customized home page for the guest," or a "home page being modified and updated as the guest's requests for access to applications get approved" as in Claim 1 as well as Claim 7. In addition, Claims 1 and 7 do not claim "[t]he set up, execution, and ongoing management of all financial transactions . . . maintained under the control of the subscriber 12 through accessing and controlling the core account through the server 14, "[t]he bill paying operation can be a bill paying procedure implemented by the server 14 that lets the subscriber 12 pay vendors electronically," "[t]he system provides ease of use and can track and consolidate the information regarding bill paying right into an account statement," "[p]ayments can include remittance information to enable proper crediting of the subscriber 12's accounts with vendors," "the server 14 can provide an account payroll function," "[t]he account payroll service will enable the subscriber 12 to set up and submit payroll information electronically,""[t]he subscriber 12 can . . . perform all standard payroll functions electronically from wherever the subscriber 12 chooses to log in, and at any time the subscriber 12 chooses to log in to the application server," "server 14 allows the subscriber 12 to download information," "server 14 allows the subscriber 12 to link the account with an accounting software package maintained by the subscriber 12, for example, at the PC workstation that the subscriber 12 is employing for accessing the server 14," "data can be downloaded to a file on a PC which can then be imported to an accounting package, such as Quicken, or any small business accounting package," or "server 14 may provide other financial transaction controls such as controls for implementing retirement plans, small business lending, business credit card management, prepaid telephone services, or any other suitable financial transactions" as taught by the cited portion of the disclosure of Starr.

Claims 1 and 7 have been rejected on the basis that the Examiner incorrectly found the limitation "determining whether approval is needed for a requested application and, if so, sending a request for approval to the application administrator and receiving a response from the application administrator" (Claim 1, lines 20-22; *see also* Claim 7, lines 20-22) to be anticipated by the following passage from the disclosure of Starr:

> Turning to FIG. 6, one example of the operation of the server 14 can be seen. As shown by FIG. 6, a process 70 is illustrated wherein the server 14 in step 72 receives the instructions from the subscriber 12 through the form or through a control activated by the client on the web page provided to the subscriber 12. In one example, the subscriber 12 instructs the server 14 to make payroll. Once the instruction is received by the server 14, the server 14 may in step 74 check an access control. The access control is part of the application server's ability to provide multiple access to a small business owner's accounts by allowing multiple users to share the account. For example, the application server 14 may allow a proprietary user, such as the root user, to set up a plurality of accounts, such as an account for their accountants, CFO or secretary. The small business owner can provide controls that set the access the other user is given. For example, the accountant can be given the control necessary to prepare bills for being paid electronically, however, can lack the necessary level of access to be able to actually kick off electronic payment. Optionally, other access controls can be set up to provide some users with view only control of monies in certain accounts.

(Starr, column 11, lines 12-35, cited in the Office Action at 3) The cited portion of Starr does not teach "determining whether approval is needed for a requested application" or "if so, sending a request for approval to the application administrator and receiving a response from the application administrator" as in Claims 1 and 7. In addition, Claims 1 and 7 do not claim "a process 70 is illustrated wherein the server 14 in step 72 receives the instructions from the subscriber 12 through the form or through a control activated by the client on the web page provided to the subscriber 12," "subscriber 12 instructs the

server 14 to make payroll," "[o]nce the instruction is received by the server 14, the server 14 may in step 74 check an access control," "[t]he access control is part of the application server's ability to provide multiple access to a small business owner's accounts by allowing multiple users to share the account, "the application server 14 may allow a proprietary user, such as the root user, to set up a plurality of accounts, such as an account for their accountants, CFO or secretary," "[t]he small business owner can provide controls that set the access the other user is given," "the accountant can be given the control necessary to prepare bills for being paid electronically . . . [but] can lack the necessary level of access to be able to actually kick off electronic payment," or "other access controls can be set up to provide some users with view only control of monies in certain accounts" as in the cited portion of the disclosure of Starr.

Finally, Claims 1 and 7 have been rejected on the basis that the Examiner incorrectly found the limitation "storing links to all applications for which the guest is approved, these links being reflected in the personalized supplier portal home page which displays a list of links to all of the applications for which the guest has been registered and authorized" (Claim 1, lines 23-25; *see also* Claim 7, lines 23-25) to be anticipated by the following passage from the disclosure of Starr:

> Thus, it can be understood that the systems and methods described herein, including those depicted in FIGS. 1-4 provide an individual or entity with an integrated tool kit for managing a plurality of financial service products. It will further be understood that these systems allow a subscriber to access the server 14 remotely, such as through the Internet, and that the subscriber 12 may enter a single user name and one ID or password and thereby gain access to the application server running on the platform 14.

(Starr, column 10, lines 4-12, cited in the Office Action at 4) The cited portion of Starr does not teach "storing links to all applications for which the guest is approved" or "links being reflected in the personalized supplier portal home page which displays a list of links to all of the applications for which the guest has been registered and authorized" as

in Claim 1 as well as Claim 7. In addition, Claims 1 and 7 do not claim "provide an individual or entity with an integrated tool kit for managing a plurality of financial service products," "systems allow a subscriber to access the server 14 remotely, such as through the Internet," or "subscriber 12 may enter a single user name and one ID or password and thereby gain access to the application server running on the platform 14" as in the cited portion of the disclosure of Starr.

For those reasons, Applicants respectfully submit that Claims 1 and 7 are not anticipated by Starr.

Claim 2

Dependent Claim 2, which has been rejected as anticipated by Starr, claims a supplier portal which, among other things, handles account setup in a manner patentably distinct from what is disclosed and taught by Starr. For example, Starr does not have any approval cycle, let alone an n-level approval cycle as in Claim 2. (Claim 2, lines 3-4) In addition, the supplier portal of Claim 2 allows enrollment to applications hosted in the Internet with as many userids and passwords as needed. A user may have one userid and password in one realm but a different userid and password for applications hosted in other realms. (Claim 2, lines __-__) Starr does not appear to teach the concept of realms but instead appears to require use of a single userid and password for all accessible services. The absence of any discussion in the disclosure of Starr of the concept of realm or of applications hosted in multiple realms may be explained by the fact that the financial services with which Starr is concerned do not require the application of such concepts. (Starr, column 8, lines 37-65, cited in the Office Action at 4) The supplier portal of Claim 2, however, does require application of concepts of realm and of applications hosted in multiple realms because the supplier portal manages registration and entitlement for applications that are completely separate from the supplier portal itself. Because Claim 2 depends from Claim 1, the foregoing discussion of Claim 1 is incorporated by reference.

Claim 2 has been rejected on the basis that *inter alia* the Examiner incorrectly found the limitation "defining 1 to n level approval cycles a user must go through to get authorized to access an application" (Claim 2, lines 3-4) to be anticipated by the following passage from the disclosure of Starr:

> The instruction generator 44 employs the information stored within a database 16 to generate instructions for the financial service provider 28. To this end, the instruction generator 44 can access data stored within the database 16 which is representative of a login data for accessing an on-line financial service provided by the financial service provider 28. The login of can include a telephone number, user account identifier, password, or any other information necessary for the server 14 to act as the subscriber's proxy in accessing the online financial services provided by the financial service provider 28.

(Starr, column 9, lines 20-30, cited in the Office Action at 4) The cited portion of Starr does not teach "defining 1 to n level approval cycles a user must go through to get authorized to access an application" as in Claim 2. In addition, Claim 2 does not claim "[t]he instruction generator 44 employs the information stored within a database 16 to generate instructions for the financial service provider 28," "the instruction generator 44 can access data stored within the database 16 which is representative of a login data for accessing an on-line financial service provided by the financial service provider 28," or "[t]he login of [sic] can include a telephone number, user account identifier, password, or any other information necessary for the server 14 to act as the subscriber's proxy in accessing the online financial services provided by the financial service provider 28" as in the cited portion of the disclosure of Starr.

Claim 2 has also been rejected on the basis that the Examiner incorrectly found the limitation "logging in by a registered guest by inputting the guest's usereid/password once for each session, as long as applications requested by the guest are in a same realm" (Claim 2, lines 5-6) to be anticipated by the following passage from the disclosure of Starr:

> For example, an [sic] continuing with the earlier described example, the subscriber 12 can employ a web browser to access the web server 40 component of the server 14 and to receive from the server 14 an HTML, XML, SGML or other suitable format document that can act as the user interface 32. In one example, the user interface 32 is an HTML page that employs the FORM tag/protocol for allowing a subscriber to transmit data to the server 14. For example, the user interface 32 can provide the subscriber 12 with a form that allows the subscriber 12 to enter a customer identifier and a password. The subscriber 12 submits the data to the server 14 and, as discussed above, the server 14 processes the data to determine whether the subscriber 12 is an authorized user and optionally the level of access to be granted to the subscriber 12.
>
> Once the server 14 determines that the subscriber 12 can have access to an account maintained by the server 14 and can determine the level of access for the subscriber 12, the server 14 can update the user interface 32, by providing to the subscriber 12 a page, such as an HTML page, that presents to the subscriber 12 one or more user controls, typically button controls, that allow the subscriber 12 to direct the server 14 to perform an integrated financial transaction. For example, one button can provide the subscriber with a control that allows the subscriber 12 to direct the server 14 to perform a payroll operation for the company. Upon activating the control, the browser can deliver to the server 14, information representative of an instruction to make payroll.

(Starr, column 8, lines 37-65, cited in the Office Action at 4) The cited portion of Starr does not teach "logging in by a registered guest by inputting the guest's usereid/password once for each session, as long as applications requested by the guest are in a same realm" as in Claim 2. In addition, Claim 2 does not claim "the subscriber 12 can employ a web browser to access the web server 40 component of the server 14 and to receive from the server 14 an HTML, XML, SGML or other suitable format document that can act as the user interface 32," "the user interface 32 is an HTML page that employs the FORM

tag/protocol for allowing a subscriber to transmit data to the server 14," "the user interface 32 can provide the subscriber 12 with a form that allows the subscriber 12 to enter a customer identifier and a password," "[t]he subscriber 12 submits the data to the server 14 and, as discussed above, the server 14 processes the data to determine whether the subscriber 12 is an authorized user and optionally the level of access to be granted to the subscriber 12," "the server 14 determines that the subscriber 12 can have access to an account maintained by the server 14 and can determine the level of access for the subscriber 12," "the server 14 can update the user interface 32, by providing to the subscriber 12 a page, such as an HTML page, that presents to the subscriber 12 one or more user controls, typically button controls, that allow the subscriber 12 to direct the server 14 to perform an integrated financial transaction," "one button can provide the subscriber with a control that allows the subscriber 12 to direct the server 14 to perform a payroll operation for the company," or "[u]pon activating the control, the browser can deliver to the server 14, information representative of an instruction to make payroll" as in the cited portion of the disclosure of Starr.

Finally, Claim 2 has been rejected on the basis that the Examiner incorrectly found the limitation "invoking by a logged in guest any of their approved applications by simply clicking the link to the desired application in the guest's customized home page" (Claim 2, lines 7-8) to be anticipated by the following passage from the disclosure of Starr:

> For example, upon logging onto the system, the web server 40 may present to the subscriber an HTML page that includes a number of controls each of which correspond to an available integrated financial transaction which the subscriber can activate.

(Starr, column 8, lines 21-25, cited in the Office Action at 4) The cited portion of Starr does not teach "invoking by a logged in guest any of their approved applications by simply clicking the link to the desired application in the guest's customized home page" as in Claim 2. In addition, Claim 2 does not claim "upon logging onto the system, the

web server 40 may present to the subscriber an HTML page that includes a number of controls each of which correspond to an available integrated financial transaction which the subscriber can activate" as in the cited portion of the disclosure of Starr.

For those reasons, Applicants respectfully submit that Claim 2 is not anticipated by Starr.

Claim 3

Dependent Claim 3 has been rejected as anticipated by Starr, even though Starr does not disclose or teach a concept of an approval cycle, let alone a customizable approval cycle for each application. (Claim 3, line 2) Because Claim 3 depends from Claims 1 and 2, the foregoing discussion of Claims 1 and 2 is incorporated by reference.

Claim 3 has been rejected on the basis that the Examiner incorrectly found the limitation "wherein the approval cycles are customizable for each application" (Claim 3, line 2) to be anticipated by the following passage from the disclosure of Starr:

> The login of [sic] can include a telephone number, user account identifier, password, or any other information necessary for the server 14 to act as the subscriber's proxy in accessing the online financial services provided by the financial service provider 28.

(Starr, column 9, lines 26-30, cited in the Office Action at 4) The cited portion of Starr does not teach "wherein the approval cycles are customizable for each application" as in Claim 3. In addition, Claim 3 does not claim "[t]he login of [sic] can include a telephone number, user account identifier, password, or any other information necessary for the server 14 to act as the subscriber's proxy in accessing the online financial services provided by the financial service provider 28" as in the cited portion of the disclosure of Starr.

For those reasons, Applicants respectfully submit that Claim 3 is not anticipated by Starr.

Claim 4

Dependent Claim 4 has been rejected as anticipated by Starr, even though Starr does not disclose or teach a concept of an approval cycle, let alone an approval cycle defined for a section of an application, providing a finer level of access control. (Claim 4, lines 2-3) Because Claim 4 depends from Claims 1 and 2, the foregoing discussion of Claims 1 and 2 is incorporated by reference.

Claim 4 has been rejected on the basis that the Examiner incorrectly found the limitation "wherein the approval cycles are defined for a section of an application, providing a finer level of access control" (Claim 4, lines 2-3) to be anticipated by the following passage from the disclosure of Starr:

> To this end, the instruction generator 44 can access data stored within the database 16 which is representative of a login data for accessing an on-line financial service provided by the financial service provider 28.

(Starr, column 9, lines 22-26, cited in the Office Action at 4) The cited portion of Starr does not teach "wherein the approval cycles are defined for a section of an application, providing a finer level of access control" as in Claim 4. In addition, Claim 4 does not claim "the instruction generator 44 can access data stored within the database 16 which is representative of a login data for accessing an on-line financial service provided by the financial service provider 28" as in the cited portion of the disclosure of Starr.

For those reasons, Applicants respectfully submit that Claim 4 is not anticipated by Starr.

Claim 5

Dependent Claim 5 has been rejected as anticipated by Starr, even though Starr does not disclose or teach application specific registration fields (Claim 5, lines 2-4). In Starr, during enrollment for a specific service, fields that are presented to a user are the same and pre-defined. (Starr, column 8, lines 37-51, cited in the Office Action at 4) But in the case of supplier portal of Claim 5, an unlimited number of fields may be configured real-time for any given application and presented to users during registration. Because

Claim 5 depends from Claims 1 and 2, the foregoing discussion of Claims 1 and 2 is incorporated by reference.

Claim 5 has been rejected on the basis that the Examiner incorrectly found the limitation "wherein application specific registration fields are defined so that a registration form, unique to an application, is displayed when a user requests access to an application" (Claim 5, lines 2-4) to be anticipated by the following passage from the disclosure of Starr:

> For example, an [sic] continuing with the earlier described example, the subscriber 12 can employ a web browser to access the web server 40 component of the server 14 and to receive from the server 14 an HTML, XML, SGML or other suitable format document that can act as the user interface 32. In one example, the user interface 32 is an HTML page that employs the FORM tag/protocol for allowing a subscriber to transmit data to the server 14. For example, the user interface 32 can provide the subscriber 12 with a form that allows the subscriber 12 to enter a customer identifier and a password. The subscriber 12 submits the data to the server 14 and, as discussed above, the server 14 processes the data to determine whether the subscriber 12 is an authorized user and optionally the level of access to be granted to the subscriber 12.

(Starr, column 8, lines 37-51, cited in the Office Action at 4) The cited portion of Starr does not teach "wherein application specific registration fields are defined so that a registration form, unique to an application, is displayed when a user requests access to an application" as in Claim 5. In addition, Claim 5 does not claim "the subscriber 12 can employ a web browser to access the web server 40 component of the server 14 and to receive from the server 14 an HTML, XML, SGML or other suitable format document that can act as the user interface 32," "the user interface 32 is an HTML page that employs the FORM tag/protocol for allowing a subscriber to transmit data to the server 14," "the user interface 32 can provide the subscriber 12 with a form that allows the subscriber 12 to enter a customer identifier and a password," or "[t]he subscriber 12

submits the data to the server 14 and, as discussed above, the server 14 processes the data to determine whether the subscriber 12 is an authorized user and optionally the level of access to be granted to the subscriber 12" as in the cited portion of the disclosure of Starr.

For those reasons, Applicants respectfully submit that Claim 5 is not anticipated by Starr.

Claim 6

Dependent Claim 6 has been rejected as anticipated by Starr, even though Starr does not disclose or teach the limitations of Claim 6. Because Claim 6 depends from Claims 1 and 2, the foregoing discussion of Claims 1 and 2 is incorporated by reference.

Claim 6 has been rejected on the basis that the Examiner incorrectly found the limitation "wherein guests may bookmark applications for later access, further comprising the step of prompting by an application a guest to enter their userid/password for authentication against data stored in the GR data store when the application is accessed using a bookmark." (Claim 6, lines 2-5) to be anticipated by the disclosure of Starr, even though Starr does not disclose or teach a comparable concept:

> [T]he Examiner believes it to be inherent that guests may bookmark applications for later access (because web interfaces can be bookmarked), further comprising the step of prompting by an application a guest to enter their userid/password for authentication against data stored in the GR data store when the application is accessed using a bookmark (when a site is bookmarked that requires authentication, future accesses to the site will require re-authentication).

(Office Action at 5) The Examiner thus admits that no portion of Starr can be cited which teaches "wherein guests may bookmark applications for later access, further comprising the step of prompting by an application a guest to enter their userid/password for authentication against data stored in the GR data store when the application is accessed using a bookmark" as in Claim 6. Applicants respectfully traverse on the basis that the Examiner's finding that it is "inherent" constitutes impermissible hindsight as well as an improper assertion of technical fact in an area of esoteric technology without

support by citation of any reference work. *See* M.P.E.P. § 2144.03, citing *In re Ahlert*, 424 F.2d 1088, 1091, 165 USPQ 418, 422-21 (CCPA 1970).

For those reasons, Applicants respectfully submit that Claim 6 is not anticipated by Starr.

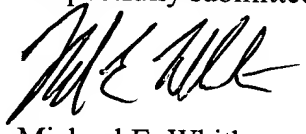
Conclusion

In view of the foregoing, it is respectfully requested that the application be reconsidered, that Claims 1-7 be allowed, and that the application be passed to issue. In the alternative, it is requested that this amendment be entered for purpose of appeal.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

A provisional petition is hereby made for any extension of time necessary for the continued pendency during the life of this application. Please charge any fees for such provisional petition and any deficiencies in fees and credit any overpayment of fees to Deposit Account No. 09-0458 (IBM-Fishkill).

Respectfully submitted,



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